

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Diane M. Doolittle (CA Bar No. 142046) Andrew H. Schapiro (admitted *pro hac vice*)
dianedoolittle@quinnemanuel.com andrewschapiro@quinnemanuel.com
3 Sara Jenkins (CA Bar No. 230097) Teuta Fani (admitted *pro hac vice*)
sarajenkins@quinnemanuel.com teutafani@quinnemanuel.com
4 555 Twin Dolphin Drive, 5th Floor 191 N. Wacker Drive, Suite 2700
Redwood Shores, CA 94065 Chicago, IL 60606
5 Telephone: (650) 801-5000 Telephone: (312) 705-7400
Facsimile: (650) 801-5100 Facsimile: (312) 705-7401
6
7 Stephen A. Broome (CA Bar No. 314605) Josef Ansorge (admitted *pro hac vice*)
stephenbroome@quinnemanuel.com josefansorge@quinnemanuel.com
8 Viola Trebicka (CA Bar No. 269526) Xi (“Tracy”) Gao (CA Bar No. 326266)
violatrebicka@quinnemanuel.com tracygao@quinnemanuel.com
9 Crystal Nix-Hines (Bar No. 326971) Carl Spilly (admitted *pro hac vice*)
crystalnixhines@quinnemanuel.com carlspilly@quinnemanuel.com
10 Alyssa G. Olson (CA Bar No. 305705) 1300 I Street NW, Suite 900
alyolson@quinnemanuel.com Washington D.C., 20005
11 865 S. Figueroa Street, 10th Floor Telephone: (202) 538-8000
12 Los Angeles, CA 90017 Facsimile: (202) 538-8100
13 Telephone: (213) 443-3000
Facsimile: (213) 443-3100
14 Jomaire Crawford (admitted *pro hac vice*) Jonathan Tse (CA Bar No. 305468)
15 jomairecrawford@quinnemanuel.com jonathantse@quinnemanuel.com
16 51 Madison Avenue, 22nd Floor 50 California Street, 22nd Floor
New York, NY 10010 San Francisco, CA 94111
17 Telephone: (212) 849-7000 Telephone: (415) 875-6600
Facsimile: (212) 849-7100 Facsimile: (415) 875-6700
18
19 *Attorneys for Defendant Google LLC*
20
21 CHASOM BROWN, WILLIAM BYATT, UNITED STATES DISTRICT COURT
JEREMY DAVIS, CHRISTOPHER NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
22 CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly
23 situated, Case No. 4:20-cv-03664-YGR-SVK
24 Plaintiffs,
25 v.
26 GOOGLE LLC,
27 Defendant.
28

DECLARATION OF JONATHAN TSE IN SUPPORT OF DEFENDANT GOOGLE LLC’S ADMINISTRATIVE MOTION TO SEAL THE COURTROOM FOR MARCH 17, 2022 DISCOVERY HEARING (DKT NO. 477)

Referral: Hon. Susan van Keulen, USMJ
Hearing Date: March 17, 2022
Hearing Time: 10:00 A.M.

I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of Google’s Administrative Motion to Seal the
7 Courtroom for March 17, 2022 Hearing related to the parties’ March 14, 2022 Joint Submission in
8 Response to Dkt. 447 re: Status of Discovery Disputes (Dkt. 485).

9 3. On March 15, 2022, Plaintiffs confirmed that they expect to reference Google's
10 Protected Material at the hearing on March 17, 2022. Plaintiffs further informed Google that they
11 do not oppose the instant motion.

13 I declare under penalty of perjury of the laws of the United States that the foregoing is true
14 and correct. Executed in San Francisco, California on March 16, 2022.

16 | DATED: March 16, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Jonathan Tse
Jonathan Tse

Attorney for Defendant